

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ELLIOTT BROIDY and
BROIDY CAPITAL MANAGEMENT, LLC,

Plaintiffs,

v.

GLOBAL RISK ADVISORS LLC,
GRA QUANTUM LLC,
GRA RESEARCH LLC,
GLOBAL RISK ADVISORS EMEA
LIMITED,
GRA MAVEN LLC,
QRYPT, INC.,
KEVIN CHALKER,
DENIS MANDICH,
ANTONIO GARCIA, and
COURTNEY CHALKER

Defendants.

Case No. 1:19-CV-11861

**DECLARATION OF ELLIOTT BROIDY IN SUPPORT OF
PLAINTIFFS' MOTION FOR SANCTIONS**

I, Elliott Broidy, declare as follows:

1. I am a plaintiff in the above-captioned action.
2. I am also the sole member of plaintiff Broidy Capital Management, LLC.
3. I submit this Declaration in support of Plaintiffs' Motion for Sanctions against Gibson, Dunn & Crutcher LLP.
4. I have personal knowledge of the facts set forth in this Declaration.
5. On March 12, 2018, I voluntarily provided to the United States Department of Justice ("DOJ") one pdf file of less than 100 pages that contained materials stolen from me in the hacking at issue in this case. I had received this pdf from a reporter, and it did not include any of my WhatsApp messages. Only a very limited number of the emails provided related to

the topics that Richard Gates was asked about during his March 18, 2018 meeting with Zainab Ahmad, as described in his declaration that is being filed with this Motion for Sanctions.

6. To my knowledge, DOJ also had not seized any documents or communications from me at that time, as DOJ executed the first search warrants on myself and my companies in the summer of 2018.

7. To my knowledge, none of my WhatsApp messages have ever been disseminated to the media. No journalist has ever asked me or any of my representatives about the content of any of my WhatsApp messages.

8. I have not seen any article or media report discussing the contents of any of my WhatsApp messages.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 23rd day of February 2023, at Los Angeles, California.

/s/ Elliott Broidy
Elliott Broidy